

Constants Law Offices, LLC
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February 9, 2025

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, NY 10007

re: Livevideo.AI Corp.v. Shari Redstone, et al
Docket No.: 24-cv-6290 (DEH) (BCM)

Dear Judge Moses:

This law firm represents the Plaintiff, Livevideo.AI Corp., in the above-referenced matter. In the Court's February 5, 2025, order, I am the person who contacted your staff on February 5, 2025, at approximately 6:30 pm. This was a courtesy call by your office. I called your office and stated my failure to list the order to show cause on my calendar. I was on trial in Bergen County for three days.

The attorneys for the Bergen County matter in Hackensack, New Jersey, appeared in court for the first time on the trial list on Tuesday February 4, 2025; discussed the case with the judge; then we were selected to continue for trial. With all the rush for trial, I did not know until the courtesy call that there was a problem with your order to show cause. Again, my apologies to you and counsel.

Your staff told me to call each of the attorney on the case, which I did. Before 7:09 pm, on February 5, 2025, I telephoned Ropes and Gray New York counsel Ani-Rae Lovell and Martin Crisp that the order to show cause will not take place because I was on trial. Thereafter, I telephoned Ropes and Gray Boston counsel Peter Welsh about the issue.

Thereafter, I emailed counsel Peter Welsh, Ani-Rae Lovell and Martin Crisp the following:

Good evening counsel,

The court called about tomorrow's OTSC. I have been on trial for two days and tomorrow I need to finish the trial in Bergen County.

Since I will not make it for tomorrow, the Court asked me to contact you that there will not be an order to show cause.

I did call for each of you and left a message.

Best regards,

Al

Please see Exhibit A.

Thereafter, you submitted the Court order on the same date.

I will be there on February 12, 2025, at 12:00 noon in courtroom 20A. I sincerely apologize for any inconvenience to the Court and Counsel because of the three day trial.

Respectfully submitted,
Constants Law Offices, LLC

/s/ Alfred C. Constants III

Alfred C. Constants III, Esq.

Exhibit A

From: Alfred Constants constantslaw49@gmail.com
Subject: Livevideo AI
Date: February 5, 2025 at 7:09 PM
To: Welsh, Peter L. Peter.Welsh@ropesgray.com
Cc: Lovell, Ani-Rae Ani-Rae.Lovell@ropesgray.com, martin.crisp@ropesgray.com

AC

Good evening counsel,

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Best regards,

AI

Alfred C. Constants III
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Best regards,

AI

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constantslaw49@gmail.com

From: Mail Delivery Subsystem mailer-daemon@googlemail.com
Subject: Delivery Status Notification (Failure)
Date: February 5, 2025 at 7:09 PM
To: constantslaw49@gmail.com

MS



Address not found

Your message wasn't delivered to **martin.crisp@rpoesgray.com** because the domain **rpoesgray.com** couldn't be found. Check for typos or unnecessary spaces and try again.

[LEARN MORE](#)

The response was:

DNS Error: DNS type 'mx' lookup of rpoesgray.com responded with code NXDOMAIN Domain name not found: rpoesgray.com For more information, go to <https://support.google.com/mail/?p=BadRcptDomain>

Reporting-MTA: dns; googlemail.com
 Received-From-MTA: dns; constantslaw49@gmail.com
 Arrival-Date: Wed, 05 Feb 2025 16:09:19 -0800 (PST)
 X-Original-Message-ID: <D9E07E00-A524-4B16-92DE-D4B01BFE382F@gmail.com>

Final-Recipient: rfc822; martin.crisp@rpoesgray.com
 Action: failed
 Status: 5.1.2
 Diagnostic-Code: smtp; DNS Error: DNS type 'mx' lookup of rpoesgray.com responded with code NXDOMAIN Domain name not found: rpoesgray.com For more information, go to <https://support.google.com/mail/?p=BadRcptDomain>
 Last-Attempt-Date: Wed, 05 Feb 2025 16:09:21 -0800 (PST)

From: Alfred Constants <constantslaw49@gmail.com>
Subject: Livevideo AI
Date: February 5, 2025 at 7:09:16 PM EST
To: "Welsh, Peter L." <Peter.Welsh@ropesgray.com>
Cc: "Lovell, Ani-Rae" <Ani-Rae.Lovell@ropesgray.com>, martin.crisp@rpoesgray.com

Good evening counsel,

The court called about tomorrow's OTSC. I have been on trial for two days and tomorrow I need to finish the trial in Bergen County.

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